

Fill in this information to identify the case:

Debtor 1 BRIAN KEITH LEWIS

Debtor 2 JULIE LYNN LEWIS F/K/A JULIE LYNN HUTTEMANN
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number 1:17-bk-02713-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known): 18

Last 4 digits of any number you use to identify the debtor's account: 8270

Property address: 2 Chestnut Hollow Drive

Number Street
*Dillsburg, PA 17019
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
 Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: _____
MM/DD/YYYY

- Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due:

(a) \$ 1,698.90, less suspense in the amount of \$274.81

- b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ 1,238.00

- c. **Total.** Add lines a and b.

(c) \$ 2,662.09

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

10/01/2022
MM/DD/YYYY

Debtor1 BRIAN KEITH LEWIS
First Middle Last

Case number (*if known*) 1:17-bk-02713-HWV

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- I am the creditor.
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Matthew Fissel Date 11/14/2022

Signature

Print Matthew Fissel (314567) Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 8757 Red Oak Blvd., Suite 150
Number Street

Charlotte, NC 28217
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE:

BRIAN KEITH LEWIS
JULIE LYNN LEWIS
F/K/A JULIE LYNN HUTTEMANN

FREEDOM MORTGAGE CORPORATION,
Movant

vs.

BRIAN KEITH LEWIS
JULIE LYNN LEWIS
F/K/A JULIE LYNN HUTTEMANN,
Debtors

Case No. 1:17-bk-02713-HWV

Chapter 13

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response To Notice Of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

JULIE LYNN LEWIS
2 CHESTNUT HOLLOW DR
DILLSBURG, PA 17019-1042

BRIAN KEITH LEWIS
2 CHESTNUT HOLLOW DR
DILLSBURG, PA 17019-1042

DOROTHY MOTT, ESQ.
MOTT & GENDRON LAW
125 STATE STREET
HARRISBURG, PA 17101

JACK N ZAHAROPOULOS, BANKRUPTCY TRUSTEE
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036

ASSISTANT US TRUSTEE
UNITED STATES TRUSTEE
228 WALNUT STREET, SUITE 1190
HARRISBURG, PA 17101

November 14, 2022

/s/ Matt Fissel

Andrew Spivack, PA Bar No. 84439
Matt Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
Attorney for Creditor
BROCK & SCOTT, PLLC
8757 Red Oak Boulevard, Suite 150
Charlotte, NC 28217
Telephone: (844) 856-6646
Facsimile: (704) 369-0760
E-Mail: PABKR@brockandscott.com

Debtor Name:	Lewis, Brian	Completed by:	Connor Elledge
BK Case Number:	17-02713	Completed Date:	11/9/2022
Filing Date:	06/29/17		
Post First Due:	07/01/17		
Post-Petition Due	Date Received	Amount Received	Amount Applied
Interest	8/9/2022	\$ 4,250.78	\$ 514.75
			\$ 3,736.03
			\$ -
			\$ 3,736.03
04/01/22	8/11/2022		\$ 1,421.47
			\$ (1,421.47)
05/01/22	8/12/2022		\$ 1,421.47
			\$ (1,421.47)
			\$ 893.09
8/12/2022			\$ -
			\$ 893.09
8/18/2022		\$ (442.52)	\$ (442.52)
			\$ 450.57
06/01/22	8/30/2022	\$ 1,990.00	\$ 1,421.47
			\$ 568.53
			\$ 1,019.10
	9/9/2022	\$ 234.66	
			\$ 234.66
			\$ 1,253.76
07/01/22	9/20/2022	\$ 1,021.47	\$ 1,421.47
			\$ (400.00)
			\$ 853.76
	9/22/2022	\$ (234.66)	
			\$ (234.66)
			\$ 619.10
08/01/22	10/13/2022	\$ 1,421.47	\$ 1,421.47
			\$ -
			\$ 619.10
09/01/22	10/13/2022	\$ 1,077.18	\$ 1,421.47
			\$ (344.29)
			\$ 274.81

Loan MOD booked by FRM 08/09/22.
Under terms of MOD, RMMP resumed
with the 4/1/22 payment.

Tee refund

Tee refund

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

IN RE:	
BRIAN KEITH LEWIS AND JULIE LYNN LEWIS fka Julie Lynn Huttemann Debtors	Case No. 1:17-bk-02713-HWV
Freedom Mortgage Corporation, Movant	Chapter 13
vs.	
BRIAN KEITH LEWIS AND JULIE LYNN LEWIS fka Julie Lynn Huttemann Respondents	11 U.S.C. §362

**STIPULATION IN SETTLEMENT OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

It is hereby stipulated by and between Brock & Scott, PLLC, counsel for the Movant, Freedom Mortgage Corporation, and Dorothy Mott, Esquire, counsel for the Debtor(s), as follows:

1. The Automatic Stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. This Stipulation pertains to the property located at 2 Chestnut Hollow Drive, Dillsburg, PA 17019, mortgage account ending with “8270”.
3. The parties agree that the total post-petition arrearage consists of one (1) monthly payment for the months of October, 2022 at \$1,698.90 each, legal fees in the amount of \$1,050.00, court costs in the amount of \$188.00, less suspense in the amount of \$274.81, resulting in the total post-petition arrearage amount of \$2,662.09.
4. Debtors will cure the post-petition arrearage by making five (5) monthly payments in the amount of \$443.68 each and one (1) monthly payment in the amount of \$443.69. Cure payments begin November, 2022 through April, 2023.
5. Debtors agree to remain current post-petition from this day forward. Beginning November 1, 2022 in the amount of \$1,698.90, all subsequent monthly payments and late charges shall be due in accordance with the terms of the Mortgage. All

payments made pursuant to this Stipulation shall be either by conduit through Debtors' Plan or by certified check or money order payable to **FREEDOM MORTGAGE CORPORATION, FREEDOM MORTGAGE / ATTN: CASH PROCESSING, 10500 KINCAID DRIVE, FISHERS, IN 46037.**

6. If Debtors provide sufficient proof (front and back copies of checks or money orders) of payments made, but not already credited, the account will be adjusted accordingly.
7. Should the Debtors fail to make any of the above captioned payments, or if any regular monthly mortgage payment commencing after the cure of the post-petition delinquency is more than fifteen (15) days late, Movant may send Debtors and counsel, if applicable, a written Notice of Default of this Stipulation. If the default is not cured within ten (10) days of the date of the Notice, Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay under §362, waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001(a)(3) so that the Relief Order is immediately effective and enforceable.
8. In the event the Debtors convert to a Chapter 7 during the pendency of this bankruptcy case, the Debtors shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, Movant shall send Debtors and counsel a written Notice of Default of this Stipulation. If the default is not cured within ten (10) days of the date of the Notice, Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay under §362, and waiving Rule 4001(a)(3) so that the Relief Order is immediately effective and enforceable.
9. Debtors' tendering of a check to Freedom Mortgage Corporation, which is subsequently returned due to insufficient funds in the account upon which the check is drawn, shall not constitute payment as the term is used in this Stipulation.
10. The parties stipulate that Movant shall be permitted to communicate with the Debtors and Debtors' Counsel to the extent necessary to comply with applicable non-bankruptcy law.
11. The parties agree that a facsimile signature shall be considered an original signature.
12. The parties request that this Court sign and docket an Order approving the Stipulation.

Dated: October 14, 2022

/s/ Mario Hanyon

Mario Hanyon, Esquire
Attorney for Movant



Kara Gendron, Esquire
Attorney for Debtors

/s/ Douglas R. Roeder, Esq.

Douglas R. Roeder, Esquire
For Jack Zaharopoulos
Standing Chapter 13 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

IN RE:

BRIAN KEITH LEWIS AND JULIE LYNN
LEWIS fka Julie Lynn Hutmenn
Debtors

Case No. 1:17-bk-02713-HWV

Freedom Mortgage Corporation,
Movant

Chapter 13

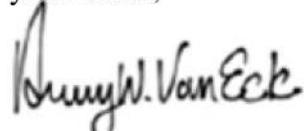
vs.
BRIAN KEITH LEWIS AND JULIE LYNN
LEWIS fka Julie Lynn Hutmenn
Respondents

11 U.S.C. §362

ORDER

Upon consideration of the stipulation filed by the parties, Doc. 76, it is
ORDERED that the Stipulation is hereby approved.

By the Court,



Henry W. Van Eck, Chief Bankruptcy Judge
Dated: October 28, 2022